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09 January 2008

Carl Goldstein
American Samoa Program Manager
Pacific Islands Office, CED-6
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Re: Request for technical assistance

Dear Mr. Goldstein:

My staff recently completed site inspections in response to a catastrophic release of diesel fuel at the COS Samoa Packing cannery facility in American Samoa. The investigation included several meetings and site inspections that included cannery personnel, ASEPA staff, and U.S. Coast Guard personnel, conducted 04-07 January 2008. The overall conclusion from these investigations is that COS Samoa Packing had a catastrophic release of approximately 4200 gallons of No. 2 fuel oil (diesel), of which approximately 4000 gallons was recovered during response actions. Approximately 200 gallons of fuel is unaccounted for, and my staff indicates that this amount is likely part of residues in sumps, channels, piping, and on concrete floors. Cleanup activities continue and it is expected that residues will be eliminated at the earliest possible date. COS Samoa Packing has engaged a professional environmental response team to assist with cleanup activities. See attached correspondence for details of this event.

During our inspections, some important issues were discovered that are related to the spill event, for which we request your assistance. First, COS Samoa Packing operated wastewater discharge activities through the joint cannery outfall without operation of the dissolved air floatation (DAF) in operation, for the period of their annual holiday shutdown. Second, our staff determined that there is a high likelihood that underground piping from the bulk fuel oil storage tank (located dockside) is leaking fuel. Our inspections verified that there is an oil sheen that is discharged from roof storm drain piping, that crosses near the buried fuel lines.

Overall, there appears to be several issues and potential violations that are relevant to the COS Spill Prevention Control and Countermeasures Plan (SPCC). We request your assistance to determine what further action is necessary to resolve this issue in favor of regulatory compliance.

Please contact me at your earliest convenience to discuss the results of this investigation in detail.

Sincerely,



Dr. T. Vaiaga, Director

cc: Fa'amao Asalele, ASEPA